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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

December 23, 1999

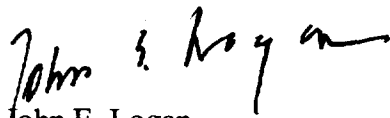
Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: *Ex parte* submission  
CC Docket 99-200, 96-98  
Number Resources Optimization

Dear Ms. Salas:

Enclosed is a letter sent to Mr. L. Charles Keller, Chief, Network Services Division of the Common Carrier Bureau, and to other individuals in the Network Services Division. The letter is in response to an *ex parte* presentation that MediaOne made to Mr. Keller and to the other members of the Network Services Division on December 14th. The necessary copies are enclosed.

Respectfully,

  
John E. Logan

Attachment

Copies provided to :

Mr. L. Charles Keller, Chief, Network Services Division, Common Carrier Bureau  
Ms. Blaise Scinto, Deputy Chief, Network Services Division  
Ms. Diane Griffin Harmon, Assistant Chief, Network Services Division  
Ms. Tejal Mehta, Network Services Division  
Mr. Patrick Forster, Network Services Division  
Mr. Aaron Payne, Network Services Division  
Mr. Les Selzer, Network Services Division

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Mr. L. Charles Keller  
Chief  
Network Service Division  
Common Carrier Bureau  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**MediaOne**  
**Group**

RE: CC Docket No. 99-200, 96-98  
Number Resource Optimization

Dear Mr. Keller:

On December 14, 1999, MediaOne made an *ex parte* presentation to you and other individuals in the Network Services Division. The presentation related to the Commission's Notice of Proposed Rulemaking in CC Docket No. 99-200, Numbering Resource Optimization. During that presentation, MediaOne was asked four questions by the staff. This letter provides responses to those inquiries.

***First, what percentage of MediaOne's customers chooses to port their telephone numbers?*** The percentage of customers porting telephone numbers varies from market-to-market. In two of MediaOne's markets, 50 percent of our customers have chosen to port their telephone numbers. In contrast, in one MediaOne market, 95 percent of our customers have chosen to port their telephone numbers. The overall composite is that 71% of our customers have chosen to port their telephone numbers.

***Second, how many of MediaOne's switches LNP capable?*** All of MediaOne's switches are LNP capable. We have long recognized that, in order to be a viable competitor offering local telephone service, we would need to be able to allow consumers to maintain their existing telephone numbers. As such, from our initial launch of service – in Atlanta in January of 1998 – we have made sure that our switches could support local number portability.

***Third, what difficulties would be imposed on MediaOne if it were required to implement thousands-block number pooling in all of its markets at once?*** MediaOne can implement thousands-block number pooling in all of its markets at one time. The most significant issue that we would face is an administrative one. More specifically, it is difficult for MediaOne to complete telephone number forecast reports. Since MediaOne does not experience straight-line growth, it is not a simple task to project our need for numbers. In addition, our staff size is limited so reporting requirements take away from our marketing and installation efforts. Nonetheless, we believe that we could manage these administrative requirements and implement pooling all at one time.

***Fourth, what process could be used to implement thousands-block number pooling in the top 100 Metropolitan Statistical Areas (MSAs) and "current" jeopardy areas?*** MediaOne suggests a three-phase process to implement thousands-block number pooling in the top 100 MSAs and "current" jeopardy areas. Phase one would commence on October 1, 2000, phase two on January 1, 2001, and phase three on April 1, 2001. By July 1, 2001, thousands-block number pooling would be completely implemented in all such areas.

To determine which areas should be included in the first phase, the Commission, through an expeditious public notice process, would ask carriers to identify areas where they would be providing telephone service, but for the lack of telephone numbers; that is, the areas where a lack of numbers precludes competitive entry or precludes a carrier from serving additional customers. There is no reason to exaggerate or mischaracterize this information. Moreover, the absence of available numbers is readily verifiable.

After expeditiously reviewing and compiling this information, the Commission would identify the high-priority MSAs and jeopardy areas that must be included in the first phase. The incumbent local exchange carriers (LECs) would then be free to determine the remaining schedule; they would have the freedom to implement pooling in the other MSAs and jeopardy areas in whichever phase best suits their needs and capabilities. This approach ensures that pooling gets implemented first where it is most critically needed, while giving the incumbents the maximum flexibility to implement pooling in the most efficient manner.

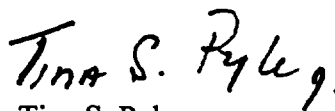
Thousands block pooling should be pursued expeditiously. It can bring about tangible reform to numbering administration, and most importantly, relief that will enhance competition for local telephone service. MediaOne's approach to thousands-block number pooling is consistent with the intent of Congress, the Commission and the state regulators – that is, ensuring that consumers and businesses receive telecommunications services from their choice of providers as soon as possible.

On behalf of MediaOne, we appreciate very much the time the Network Services Division has afforded our views. If you have any additional questions, please do not hesitate to contact us.

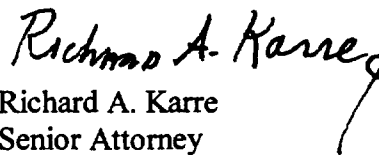
A copy of this letter will be filed with the Commission's Secretary.

Respectfully,

Susan M. Eid  
Vice President for Federal Relations  
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Copies Provided To:

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Ms. Diane Griffin Harmon, Assistant Chief, NSD  
Ms. Tejal Mehta, NSD  
Mr. Patrick Forster  
Mr. Aaron N. Goldberger  
Mr. Barry Payne  
Mr. Les Selzer